


# **EXHIBIT N**

April 12, 2019 Email and Attachment from  
Christopher Austin to Ronald Green

**From:** F. Christopher Austin [caustin@weidemiller.com](mailto:caustin@weidemiller.com)   
**Subject:** Switch v. MTech: Keywords  
**Date:** April 12, 2019 at 3:08 PM  
**To:** Ron Green [rdg@randazza.com](mailto:rdg@randazza.com)

FA

Ron:

Here is our list of keywords for the data search.

All get you a list of misappropriated trade secrets shortly.

Have you been able to confirm that with my execution of any NDA your client requests, I will be given access to all documents resulting from the search of agreed upon keywords, so we do not have to reach the issue of Switch limiting its agreement to pay for the OpenText search if its counsel is not permitted to review all such search results?

Chris

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**SWITCH v. FAIRFAX**

**Keyword Search**

Time Window

August 6, 2015 to Present [or narrow to date of Aligned construction]

Persons of interest

1. Rob Roy
2. Neal Dowling
3. Tim Griffin
4. Yoonik Kim
5. Andrew Schaap
6. Jakob Carnemark
7. Thomas Doherty
8. John Petralia
9. Rejendran Avandaippan
10. John Greenwood
11. Tom Blair
12. Kirk Offel
13. Anubhav Raj
- 14.
- 15.

Corporations/Entities

16. Switch
17. Aligned
18. MTech
19. Inertech

Topics

20. T-SCIF
21. SCIF
22. Heat shield
23. Thermal separate compartment
24. Hot aisle containment
25. Containment Rows
26. Plenum path
27. Power spine
28. NAP
29. Co-location
30. Customer pod

31. HVAC
32. NDA and any other term
33. Non-disclosure agreement and any other term
34. Confidential and any other term
35. Aligned
36. Power Usage Effectiveness or PUE and 1.5
37. Power Usage Effectiveness or PUE and 50 or 50 KW
38. US Pat 8072780
39. US Pat 8523643
40. US Pat 9198331
41. US Pat 9622389
42. Air handling
43. Integrated wiring system
44. [terms specific to patents issuing post Aligned construction]
45. [terms specific to describing the T-SCIF]
46. [terms specific to describing the power spine]
47. [terms specific to describing the use of exterior cooling systems]
48. [terms specific to describing the heat management process of the T-SCIF]
49. [terms specific to describing the redundant power management system]

#### Format

50. Email and attachments
51. Text
52. Telephone records
53. Voicemail
54. Memoranda
55. Reports
56. Spreadsheets
57. Presentations (PowerPoint, etc.)
58. Calendars
59. Marketing/promotional material
60. Blue prints
61. Contracts
62. Orders
63. Invoices
64. Meeting agenda and minutes
65. Video
66. Photographs
67. Blog posts
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